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Plaintiff - *In Pro Se*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

SAMUEL BERNARD JOHNSON III,

Plaintiff,

vs.

CHEVRON CORPORATION, a Delaware  
corporation, CHEVRON  
ENVIRONMENTAL MANAGEMENT  
COMPANY, a California corporation, and  
DOES 1-10,

Defendants

Case No.: C 07-05756 SI

**[PROPOSED] ORDER GRANTING  
PLAINTIFF'S MOTION TO COMPEL  
DISCOVERY FROM DEFENDANTS  
CHEVRON CORPORATION, CHEVRON  
ENVIRONMENTAL MANAGEMENT  
COMPANY, THEIR ATTORNEY  
OF RECORD AND REQUEST FOR  
SANCTIONS**

1 The Court having read and considered the briefs and arguments of counsel and all other  
2 matters presented to the Court in connection with Plaintiff's Motion to Compel Discovery and  
3 Request for Sanctions, the motion is hereby **GRANTED**. Defendants Chevron Corporation,  
4 Chevron Environmental Management Company and their attorney of record are to produce the  
5 requested discovery within \_\_\_\_\_, days of this Order.

6 **IT IS FURTHER ORDERED** that Delia A. Isvoranu, Esq. of Filice Brown Eassa &  
7 McLeod, LLP and Defendants Chevron Corporation and Chevron Environmental Management  
8 Company shall be sanctioned in the dollar amount of \$\_\_\_\_\_. The Court also  
9 orders that all of Plaintiff Johnson's costs in bringing the Motion to Compel and Request for  
10 Sanctions be reimbursed.

11 **IT IS SO ORDERED.**

12  
13  
14 Dated this \_\_\_\_\_ day of August 2008

HONORABLE JOSEPH C. SPERO  
UNITED STATES DISTRICT JUDGE